

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

WILLIAM J. LOVELACE and	:	No. 16-CV-04978 (ERK)(CLP)
OCTAVIA LOVELACE	:	
Plaintiffs,	:	
	:	
v.	:	
	:	
	:	
SHOWROOM AUTO, LLC	:	
Defendant	:	
	:	

**Declaration of Plaintiffs' Attorney Daniel S. Blinn in Support of Motion to Vacate**

The undersigned hereby declares under penalty of perjury that the following is true and correct:

1. I am over eighteen years of age, and I believe in the obligations of an oath.

2. I am the founder and Managing Attorney of Consumer Law Group, LLC ("CLG"), a private law firm established on September 1, 1997, that focuses its practice upon representing consumers against business entities and the advancement of consumer rights and protection matters.

3. I am co-counsel on the above-captioned case with Attorney Brian Bromberg.

4. I have had responsibility over all aspects of this case and have maintained this file and all relevant documents since its opening.

5. I can attest to the authenticity of the following documents that are part of this case file and attached to this Declaration in Support of Plaintiffs' Motion

to Vacate.

6. Exhibit 1 to this Declaration is a true and correct copy of the October 19, 2017 demand for arbitration.

7. Exhibit 2 to this Declaration is a true and correct copy of the July 26, 2018 prehearing memorandum filed by Plaintiffs/Claimants.

8. Exhibit 3 to this Declaration is a true and correct copy of the July 27, 2018 prehearing memorandum filed by Defendant/Respondent.

9. Exhibit 4 to this Declaration is a true and correct copy of the August 27, 2018 letter sent to the arbitrator regarding post-hearing brief on which I was copied.

10. Exhibit 5 to this Declaration is a true and correct copy of Claimants' August 24, 2018 post-hearing brief.

11. Exhibit 6 to this Declaration is a true and correct copy of the September 26, 2018 award of arbitrator.

Dated: November 19, 2018

/s/ Daniel S. Blinn  
Daniel S. Blinn